

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Continue
Implementation and Administration, and
Consider Further Development of, California
Renewables Portfolio Standard Program

Rulemaking 15-02-020
(Filed February 26, 2015)

**REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U902-E)
ON INTERCONNECTION ISSUES RELATED TO THE BIOENERGY FEED-IN
TARIFF**

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June 3, 2016

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I. INTRODUCTION

Pursuant to Rule 14.3 of the Rules of Practice and Procedures of the California Public Utilities Commission (“Commission”), and Administrative Law Judge Anne E. Simon’s May 6, 2016, Ruling Requesting Supplemental Comment on Interconnection Issues Related to the Bioenergy Feed-in Tariff Under the California Renewables Portfolio Standard (“Ruling”), San Diego Gas & Electric Company (“SDG&E”) hereby submits reply comments in response to certain comments filed¹ on the interconnection proposal of Bioenergy Association of California (“BAC”).²

II. DISCUSSION

A. BAC’s Proposal Should Not Be Adopted for All BioMAT Categories.

BAC, with AECA’s support, recommends that the Commission extend BAC’s interconnection proposal to all categories/projects in the BioMAT program.³ If the Commission decides to adopt BAC’s proposal in order to meet the goals of the Governor’s Emergency

¹ Opening comments were filed on May 25, 2016, by: SDG&E, Southern California Edison (“SCE”), Pacific Gas & Electric Company (“PG&E”), the Clean Coalition, BAC, and the Agricultural Energy Consumers Association (“AECA”).

² All statutory references herein are to the California Public Utilities Code unless otherwise specified.

³ BAC Comments at 7; AECA Comments at 2.

Proclamation, it should not extend the proposal to all BioMAT categories. Neither BAC nor AECA offer compelling arguments as to why the Commission should expand this interconnection proposal to all categories in the BioMAT program. Both parties claim that the current interconnection requirements are too burdensome for all BioMAT projects, but this assertion has not been established. Further, interconnection requirements are designed to assure equal treatment among applicants and it is not appropriate to create exceptions such as BAC's proposal. The Commission should ignore this claim given that the program is in its infancy and is only now in its second program period. The Commission should reject BAC's (and AECA's) proposal and at most consider it again after parties have more experience in implementing the program.

B. Interconnection Timing Is Not Solely Dependent Upon the Utility.

BAC is incorrect in stating that "the timeline for interconnection is completely dependent on the utility and therefore beyond the control of the project development team."⁴ BAC's belief that a utility can perform the required interconnection work within 24 months⁵ is short-sighted and fails to consider the numerous factors that are out of the utility's control. BAC fails to address the fact there are issues in which SDG&E plays no part, which can delay interconnection. These issues include: 1) an applicant may not provide a complete interconnection application, resulting in the utility having insufficient information to perform the study; 2) an applicant has a set number of days built into the timeline for each stage of the study, and thus the more days the applicant utilizes, the longer it takes to complete the application; 3) obtaining construction permits from the local authority having jurisdiction ("AHJ") and environmental permits are often major challenges that the utility cannot control; and 4)

⁴ BAC Comments at 5.

⁵ *Id.*

interconnection may require special equipment which the utility does not stock. Additionally, the interconnection process is a collaborative effort between the utility's interconnection team and the developer which does not leave sole discretion on any one party to meet goals within a set timeframe. For these several reasons, BAC's "timing" proposal should be rejected.

Respectfully submitted this 3rd day of June, 2016.

By: /s/ Paul A. Szymanski
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AFFIDAVIT

I am an employee of the respondent corporation herein, and am authorized to make this verification on its behalf. The matters stated in the foregoing **REPLY COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U902-E) ON INTERCONNECTION ISSUES RELATED TO THE BIOENERGY FEED IN TARIFF** are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of June, 2016, at San Diego, California,

/s/ *Fernando Valero*

Fernando Valero
Partnerships and Programs Manager
Origination and Portfolio Design Department